



Determining What's Important

Executive Summary

American identity in the early 21st century is more diverse and multicultural than it was at the adoption of the National Historic Preservation Act in 1966. For the National Register of Historic Places to remain a “people’s register,” it needs to continue to evolve with the American public. A major challenge at the 40th anniversary of the National Historic Preservation Act is to blend the labor-intensive scholarship of improved, contextualized nominations with a system that can respond positively when the people decide something is important. The official systems for determining what is important are still flexible and viable. However, in practice, the Federal preservation bureaucracy has become complex and difficult to navigate. Future efforts to determine what is important need to address the disconnect between theory and practice in some aspects of the preservation system, the role of the preservation profession in making these determinations, and the economic factors influencing the evaluation of culturally significant resources.

The committee identified five recommendation areas—representation, criteria and integrity, intangible heritage, economics, and engaging professional experts and community. Representation addresses the importance of acknowledging diverse resources representing the full complexity of America in the 21st century, and therefore expanding the means by which this heritage is recognized and protected. The National Register of Historic Places designation criteria and process are seen as daunting and inadequate to recognize the full range of resources. There is a need to rethink the seven aspects of integrity to reemphasize association, setting, and feeling; as well as the guidelines focusing on resources more than 50 years old and resources associated with living persons.

Intangible heritage should be recognized through awareness of other entities involved in recording non-material cultural heritage such as rituals, dances, and skills. Preservation should include place-based recognition of intangible heritage and expanded use of the traditional cultural property category. Economics can have a pervasive influence on determining what is important even though not officially part of this process. Because of the link between official listings and heritage tourism, it is important to acknowledge both the positive and negative effects that economic development through heritage tourism can have on cultural resources. Communication among professional experts and community requires that experts go beyond their usual circles and use more accessible language to engage the general public on the processes and effects of preservation.

Expert Panel Focus and Methodology

The Determining What's Important panel met on September 7, 2006, in a meeting room at 444 North Capitol Street, NW, in Washington, DC. The National Conference of State Historic Preservation Officers sponsored our meeting, making it convenient for visitors to the city's commercial center. The panel was made up of two co-chairs: Doug Scott, Society for Historical Archaeology and Toni Lee, National Park Service, and panel members: Elena Daly, Bureau of Land Management; Wayne Donaldson, California SHPO; John Franklin, National Museum of African American History and Culture; Ron James, Nevada SHPO; Arden Kucate, Pueblo of the Zuni; Cheryl LaRoche, University of Maryland; Randy Mason, University of Pennsylvania; and Kirsti Uunila, Calvert County, MD government. NPS staff members Lisa Davidson and Sarah Hopson were in attendance and ACHP staff member, Laura Dean, observed. Kathleen Deagan of the Florida Museum of History had planned to attend, but was unable to do so because of flight cancellations.

Prior to the meeting, all panel members and staff received packets of information, including a summary of the history of the topic and suggested readings. They also received copies of the responses received on the Determining What's Important WebForum site.

The meeting began with an open discussion of the National Register and other official recognition programs and how well they represented the identity of the American people in the 21st century. The discussion covered many areas of concern related to the topics, including the role of professional experts, theory vs. practice, the recent past, the development of tribal registers, archeology, the role of designations in everyday life, and traditional cultural properties.

The remainder of the meeting was devoted to developing recommendations that fell into five major topic areas: 1) representation, 2) criteria and integrity, 3) intangible heritage, 4) economics, and 5) engaging professional experts and community. Lisa Davidson was tasked with developing a draft of the recommendations and discussion, which was distributed by the co-chairs and the panelists for their comments and edits.

The meeting took a breather at lunch, when Richard Longstreth of George Washington University's historic preservation program, joined the group to present his thoughts on the past 40 years of Determining What's Important. The Longstreth talk highlighted the use of the concept of cultural landscapes as a way to incorporate multiple disciplines and points of view.

The group was a highly diverse one because it represented not only a number of disciplines involved in historic preservation work, it also included professionals at various levels of government and several cultural groups. Despite this diversity of background, there was universal agreement that the official recognition programs needed to become more representative of the American people as they are in the 21st century and needed to change in order to incorporate more types of historic places with greater ease and fewer barriers.

Findings

“Determining What’s Important” is a key component of the national historic preservation program. It relates to what is significant and worthy of preservation. What is worthy of preservation is linked to official recognition programs and thus to government and private incentives, protections, and investments.

National Register of Historic Places and National Historic Landmark criteria guide evaluations of the potential significance of historic properties. So too do criteria used in state historic registers, local government designation programs, and the World Heritage program.

The role of determining what is important is incorporated into the preamble to the National Historic Preservation Act:

...the increased knowledge of our historic resources, the establishment of better means of identifying and administering them, and the encouragement of their preservation will improve the planning and execution of Federal and federally assisted projects and will assist economic growth and development...

With the passage of the National Historic Preservation Act, the historic preservation system called on all States to establish State Historic Preservation Offices, which are responsible for conducting comprehensive statewide surveys of historic properties, maintaining inventories of such properties, and identifying and nominating eligible properties to the National Register of Historic Places. In addition, the law encouraged the establishment of Federal Preservation Offices and later Tribal Historic Preservation Offices and Certified Local Governments. All levels of government are involved with surveys and National Register nominations and many States, Tribes, and local governments maintain their own registers and designation processes.

In the decades that followed 1966, as government-sponsored surveys were undertaken, many new property types were incorporated. They included vernacular architecture, engineering structures, cultural landscapes, historic properties associated with cultural and ethnic groups, historical archeological properties, commercial archeology, and many more. The universe of historic properties also evolved chronologically to incorporate 1920s bungalow neighborhoods, Depression-era garden apartments, World War II resources, Cold War resources, and more recently, the heritage of the post-World War II suburban boom.

Over the next 40 years, it is likely that new generations of preservationists will address the established historic properties template as well as expand the definition to include historic resources of the 1960s, 1970s, and succeeding decades. It also is likely that preservationists will make fresh examinations of older types of resources to determine what new areas of significance can be fleshed out of already-recognized historic properties.

Historic properties include a number of components that help determine what is important. Among these are the buildings, cultural landscapes, traditional uses, and the buried parts—the archeology. Surviving features such as privies, long-gone roads, and trash deposits tell us of the evolution of the place and, in a very real way, all form an expression of the lives of those who resided and used those places.

It is time to ask the larger questions of what is of value, what is important, what is significant, and what constitutes physical integrity for historic properties. With 40 years since the passage of the

1966 National Historic Preservation Act and 71 years since the 1935 Historic Sites Act, the preservation field has accumulated a great deal of experience looking at historic properties and knowing what has worked well. The field should be able to move this endeavor to the next level to incorporate the values of the 21st century nation.

Ideas for Consideration

Idea 1: Representation

We acknowledge the importance of diverse resources representing the full complexity of America in the 21st century; therefore we need to expand the means by which this heritage is recognized and protected.

The National Register of Historic Places, National Historic Landmarks Program, other aspects of the Federal preservation system, and state and local registers recognize a wide variety of historic resource types. However, improvement needs to be made in the racial, ethnic, and geographic diversity of these official listings. Other underrepresented historic resources include those of the recent past, cultural landscapes, and vernacular architecture.

The panel identified a number of structural and social barriers to having a fully representative listing through these official recognition methods. These include the complex research requirements for a National Register nomination; the lengthy guidelines and bulletins necessary to interpret the otherwise broad and flexible National Register criteria; a pattern of disengagement between public preservation officials and African American and other minority communities. Some of these barriers are the unfortunate by-product of general improvements, such as the higher scholarly standard of the typical National Register nomination. Others reflect the particular economic pressures on African American and other minority communities that make navigating the preservation bureaucracy difficult and impractical when responding to an immediate preservation crisis with limited resources. Protection for properties that are still in the process of being nominated might be a way to address the difficulties experienced by preservation groups without access to professional assistance. Also crucial to full representation is greater diversity within the preservation profession so that these experts reflect the demographic of the American public.

Periodically the idea has been raised of forming parallel National Registers with different criteria to better incorporate unrepresented communities. The committee felt that multiple registers on the national level would lead to inequality and a second tier system considered not as good or prestigious. Additional registers would also raise complicated questions regarding access to tax credits and other economic incentives which are legally tied to National Register listing.

One solution is adjusting the listing criteria to better address the dynamic nature of historic resources and to take into account contextual difficulties in documenting vernacular and ethnic properties. Contextual statements and bibliographies should be made more accessible to the public in order to allow a wider variety of people to draw on these resources. High style architecture is often easier to research and nominate, and therefore, these types of resources are more frequently recognized as important. Historically-significant resources as well as modest or vernacular resources often require an even larger amount of intellectual work to prepare a nomination. More encouragement for documentation of cultural landscapes and traditional cultural properties would also improve the diversity of representation in National Register listings.

Idea 2: Criteria and Integrity

The National Register of Historic Places designation criteria and process are seen as daunting and inadequate to recognize the full range of resources. There is a need to rethink the seven aspects of integrity to address the dynamic evolution of many properties, as well as the guidelines specifying resources be more than 50 years old or not be associated with living architects, designers, or other persons.

The committee recognized the strengths of the broad and flexible National Register criteria while acknowledging that improvements are needed to make the system more user-friendly and inclusive. Any changes in the guidelines for how to interpret the criteria need to avoid creating additional lengthy interpretative bulletins and be communicated to those involved in all levels of the process.

A greater recognition of change over time needs to be utilized when applying the criteria and defining the period of significance. The current model assumes that historic resources are largely static while a more dynamic view more accurately reflects reality. Significance statements should reflect layers of history and incorporate change over time into the story of a historic resource, rather than viewing these changes as generally negative. An effort should be made to update listings to reflect current status, so the National Register is not just a record of conditions when a property was listed. For some cultural groups the effect of change is not as important as memorializing the process of change.

Just preparing the necessary documentation can be a challenge for groups with limited resources. An added level of protection during the documentation process could preserve resources now lost before determined eligible or listed. Often the criteria as applied are not compatible with tribal perspectives on historic resources. One solution could be the establishment of tribal registers that could be legislatively aligned to serve a similar function to SHPOs under Section 106. These registers could also be used to better inform the SHPO about tribal interests and priorities. For example, the Yurok tribe maintains the National Register within its reservation as well as a separate register of sacred property.

Bringing a more dynamic understanding of change over time into the National Register criteria is closely linked to the analysis of the seven aspects of integrity—location, design, setting, materials, workmanship, feeling, association. While basic standards are necessary, a strict interpretation of architectural integrity can exclude properties that still possess considerable historical significance. An example is Rosenwald or colored schools which have been changed and adapted for later uses, but still represent a significant historic structure. Design and workmanship tend to be weighted most heavily when evaluating integrity. Instead, association, setting, and feeling should be more strongly considered when evaluating integrity to incorporate a larger variety of resources.

The committee also recognized a need for more flexibility in the 50-year rule and association with living persons guideline, which as applied amount to obstacles. While National Register criteria consideration G allows for listing properties less than 50 years of age of exceptional importance, many significant properties are lost before they reach that age. Also longer life spans have made the restriction on listing properties associated with living architects and designers problematic in many cases.

Idea 3: Intangible Heritage

We should recognize that there are other entities involved in the recording of non-material cultural heritage. We should be aware of these efforts and how we can utilize preservation to

interpret this heritage in specific places. Places where cultural traditions take place could be recognized through expanded use of traditional cultural property listing.

The definition of cultural resources should include the non-material as well as the physical environment. This “national treasure” concept recognizes that there are things within culture—rituals, dances, skills, etc. — that should be preserved beyond buildings. Other organizations, such as the National Endowment of the Arts, the Library of Congress, and the Smithsonian Institution Folklife Festival are actively involved in documenting intangible cultural heritage. While these programs are better suited to documenting non-material heritage, the committee felt that preservation organizations need to be more aware of these efforts and the importance of a complete cultural perspective when determining what is important about historic resources.

One mechanism that recognizes historic places without necessarily requiring tangible preservation is the state historic marker programs. While this process can be effective, it is underutilized and can lack the impact of federally recognized resources. The use of plaques to commemorate events, people, and historical associations deserves a greater role in the preservation field.

The 1992 Amendment to the National Historic Preservation Act included recognition of intangible heritage associated with a place through listing of traditional cultural properties (TCP) in the National Register. TCPs are eligible for National Register listing for association with the cultural practices or beliefs of a living community. This tool is potentially powerful, but underutilized. TCP listing has mainly been pursued by tribal groups, but many others could benefit from this concept. One obstacle to applying TCP criteria is the emphasis on continuous use or living culture. This requirement limits the application of TCP criteria for historic resources being rediscovered or reclaimed by a later generation.

Another technique for telling broader stories about cultural values and intangible heritage is to link these concepts to a representative place, such as New Orleans Jazz National Historical Park. It is important to consider a broad understanding of space and geography when connecting place with a historic concept or theme. An example was considering the entire Chesapeake Bay as part of the Underground Railroad story.

Idea 4: Economics

We recognize the pervasive influence of economics on determining what is important, even if not officially part of the process. Because of the link between official listings and heritage tourism, it is important to acknowledge both the positive and negative effects that economic development through heritage tourism can have on cultural resources.

It is appropriate to keep economics at arms length in the listing process because these issues should not be a part of determining historic significance. However, many of the motivations for the listing process relate to economics. Economic forces such as the preservation tax credits strongly influence which properties are considered for listing. In California, about 40 percent of National Register listings were driven by economic considerations, typically in connection with tax incentive projects. Twenty-eight states and some cities tie tax credit programs to listing. These jurisdictions generally have the strongest preservation programs.

A values-centered preservation model indicates that a variety of factors influence every preservation decision, making a multi-disciplinary and holistic understanding of our cultural motivations essential to the successful growth of preservation. Often economic values, or the perceptions surrounding economic values, trump cultural values when they come into conflict.

Sometimes concerns arise that listing places of significance might adversely impact traditional or historic uses. This concern tends to center around economic values, land access issues, and which historic or traditional use is most important.

It is also important to recognize that listing, particularly those leading to heritage tourism, can have positive or negative impacts depending on the community. Once properties are listed, there can still be minimal protection against economic pressures. While determining what is important is a critical step, a more holistic planning process and/or density rules can be a more effective means of protecting historic resources from economic pressures.

Idea 5: Engaging Professional Experts and Community

Professional experts need to go beyond their usual circles and use more accessible language to engage the general public on the processes and effects of preservation.

Communication among preservation stakeholders—including experts and laymen—encounters a number of barriers at the local, state, and national levels. These barriers include language, knowledge of the process, and expert use of jargon. State review boards often demand more technical nominations. The cost of having a nomination professionally prepared adds another barrier to the process. In addition, each state has a slightly different interpretation of the National Register that can create confusion even though this decentralization of control also can be a positive attribute.

There are a number of potential solutions, starting with being self-aware regarding the inherent elitism in current preservation practice. Communication between professionals and the general public has to be a two-way street with experts listening to public opinion regarding what is important or historically significant. Too often government agencies only go through the motions of public input, bringing conclusions or solutions to a small group of stakeholders for rubber stamp approval. Public consultation early in the process would encourage more complete engagement with preservation projects. Contextual statements and other professional research should be made more readily available to members of the public preparing nominations.

The committee also suggested that three nomination categories—proposed, eligible, and listed—with some degree of protection at each stage would better protect historic resources while navigating through the process. For archeology, particularly within federal agencies, a determination of eligibility is enough to proceed so these entities do not actually invest the time to write a nomination. Additional incentives are needed to encourage archeologists to undertake the complete nomination, especially for complicated thematic nominations of non-contiguous sites. Writing a nomination could be specified as the proper conclusion of a government project by including it in the project scope of work and budget from the outset.

In general, a multi-disciplinary approach to preservation enhances engagement with professional experts and the community. At the professional level, a multi-disciplinary approach to training creates a tendency to address a broader audience when presenting preservation information. A diverse approach to heritage education in elementary, middle, and high schools enhances a preservation sensibility and awareness of place. The concept of cultural landscapes is again useful here to encourage a more holistic and up-to-date approach to preservation throughout society.

Conclusions

During the past 40 years, the historic preservation field has made major strides in broadening the definition of what is important and significant and worthy of preservation at the local, state, and national levels, and to a large degree, has fulfilled a major objective of the National Historic Preservation Act. However, the character of the nation has changed dramatically since the mid-1960s. Thus, the official recognition programs need to examine their criteria, interpretations of criteria, integrity requirements, processes, guidance, and public outreach so that a greater number of ethnic and cultural groups and resources of the recent past will be represented.